

REMARKS

The Office Action rejected Claims 1-25, 27 and 34-38. Applicants cancelled Claims 9 and 38; amended Claims 1-2, 6, 11, 23, 34-35; and added Claims 40-47. Claims 1-8, 10-25, 27, 34-37, and 40-47 remain. Applicants respectfully request that the Examiner reconsider and withdraw the rejection.

A Petition for a three (3) month extension of time and an Information Disclosure Statement accompany this Amendment as separate papers.

Claim Rejections - 35 U.S.C. § 102

The Office Action rejected claims 1-3, 5-7, 9-13, 17, 23, 24, 27 and 34-38 as being anticipated by United States Published Application Number 2001/0056310 to Aoki ("Aoki"). With respect to claims 2, 9, 11, 12, 13, 17, 36 and 37, Applicants believe the rejection was improper and must be withdrawn. Specifically, Aoki fails to disclose or to suggest all of the features described in these claims.

Applicant rewrote dependent claim 2 in independent form. Even as previously written, claim 2 recited, *inter alia*, the step of generating a "new tag." Aoki describes a "rewriteable" task card 20 (¶ 39). None of the remaining references provide a motivation for such a modification. In fact, any such modification would teach away from Aoki. Aoki describes one key benefit of its invention is the reduced use of paper by not printing new tags (*see, e.g.*, ¶ 52).

Applicant inserted the feature described in dependent claim 9 into independent claim 6. Claim 6 now recites, *inter alia*, that the output includes "routing information." Aoki fails to disclose or to suggest such a feature. Aoki describes a rewriteable work slip upon which a reader/writer can provide "task update information." Aoki neither describes nor suggest the creation of routing information. In fact,

none of the remaining references provide a motivation for such a modification. Claims 7, 8 and 10 depend from independent claim 6 and should likewise be found allowable.

Applicant rewrote dependent claim 11 in independent form. Even as previously written, claim 11 recited, *inter alia*, the steps of receiving and processing "part disposition" and of generating output responsive to such part disposition. Aoki fails to disclose or to suggest such a feature. Aoki describes a system that generates updated task details. Aoki neither discloses nor suggest that such updated tasks details are generated in light of part disposition. In fact, none of the cited reference provide a motivation for such a modification.

With respect to claims 12, 13, 17 and 36, independent claims 12 and 36 each recite, *inter alia*, the generation of "tailored work instructions" responsive to "work location information." Aoki fails to disclose or to suggest such a feature. Aoki describes a system that generates updated task details. Specifically, Aoki states that when the user loads the work slip 20 into the reader/writer 121, the system prints the most recent task details "applicable to the product 18" on the work slip (¶ 43). In other words, the system updates a global task list, and does not generate a task list specific to the work location as required by the claim. None of the remaining cited references provide a motivation for such a modification. Claims 13 and 17 depend from independent claim 12, and should likewise be found allowable.

Claim 37 recites, *inter alia*, a computer system with "means for processing said first and second part identifier information to produce first and second part dispositions," where the "second part disposition may require adjustment to the first part disposition." Aoki fails to disclose or to suggest such a feature. As described above, Aoki merely describes a system that provides the most recent task instructions relevant to a product. Aoki neither describes nor suggests the modification of disposition

information for a first part in response to disposition information for a second part. None of the cited references provide a motivation for such a modification.

In light of the foregoing, the rejection of claims 2, 9, 11, 12, 13, 17, 36 and 37 was improper and must be withdrawn.

With respect to claims 1-3, 5, 23, 24, 27, 34 and 35, Applicants modified independent claims 1, 23, 34 and 35. The claims each now recite, *inter alia*, that the tag (claims 1 and 34) or output (claims 23 and 35) comprises "routing information." Aoki fails to disclose or to suggest such a feature. Aoki describes a rewriteable work slip upon which a reader/writer can provide "task update information." Aoki neither describes nor suggest the creation of routing information. In fact, none of the remaining references provide a motivation for such a modification.

Applicants cancelled claim 38. Accordingly, the rejection is now moot.

In light of the foregoing, Applicants request that the Examiner reconsider and withdraw the rejection.

The Office Action rejected claims 14, 20, 21, and 37 as being anticipated by United States Patent Number 6,516,239 to Madden *et al.* ("Madden"). Applicants assert that the rejection was improper and must be withdrawn. Specifically, Madden fails to disclose or to suggest all of the claimed features.

Independent claim 14 recites, *inter alia*, "determining whether said second part disposition requires adjustment to said first part disposition" and "if necessary, modifying said first part disposition." Madden is an assembly line control system that moves vehicles to various lanes within the

assembly facility so that contiguous groups of vehicles with the same lot number enter final assembly as a batch. Madden describes that "delayed vehicles are prioritised and an attempt is made to move the vehicle downstream more quickly in an attempt to re-unite the delayed vehicle with other members of its assigned lot." (Madden, col. 21, l. 65 to col. 22, l. 1). While Madden prioritizes the delayed vehicle, the disposition of the other vehicle is not modified as required by independent claim 14. In addition, none of the cited references provide a motivation for such a modification. Accordingly, the rejection of independent claim 14, along with claims 20 and 21 that depend from independent claim 14, was improper.

Similarly, independent claim 37 recites, *inter alia*, that the "second part disposition may require adjustment to said first part disposition." As stated above, Madden attempts to re-unite delayed vehicles with other members of its assigned lot. Madden, however, does not modify the disposition of the other vehicle as described in claim 37. None of the cited references provide a motivation for such a modification. Accordingly, the rejection of independent claim 37 was improper. Applicants request that the Examiner reconsider and withdraw the rejection.

In light of the foregoing, Applicants request that the Examiner reconsider and withdraw the rejection.

Claim Rejections - 35 U.S.C. § 103

The Office Action rejected claims 4, 8, 15, 16, 18, 19 and 25 as being unpatentable over Aoki in view of United States Patent Number 6,338,045 to Pappas ("Pappas"). As discussed above, Aoki fails to disclose or to suggest all of the features recited in independent claims 1, 6, 12 and 23. Pappas fails to overcome the shortcomings of Aoki. For at least this reason, the rejection of dependent claims 4, 8, 15, 16, 18, 19 and 25 was improper and must be withdrawn.

The Office Action rejected claim 22 as being unpatentable over Madden in view of Pappas. As described above, Madden fails to disclose or to suggest all of the features of independent claim 14, from which claim 22 depends. Neither Pappas nor the remaining cited references overcome the shortcomings of Madden. For at least this reason, the rejection was improper and must be withdrawn. Applicants request that the Examiner reconsider and withdraw the rejection.

Conclusion

In light of the foregoing, Applicants submit that the claims are now in condition for allowance. Applicants request that the Examiner reconsider and withdraw the restriction requirement and rejection. Applicants solicit the allowance of Claims 1-8, 10-25, 27, 34-37, and 40-47 at an early date.

Applicants authorize the Commissioner to charge the \$750 fee for the presentation of two (2) additional independent claims (11 – 9 previously paid for = $2 \times \$200 = \400), for the presentation of seven (7) additional claims (37 – 30 previously paid for = $7 \times \$50 = \350), and for any fee due under 37 CFR 1.16 or 17, or to credit any overpayments, during prosecution of this Application, to Deposit Account Number 21-0279.

Respectfully submitted,



Brian J. Hamilla
Registration Number 38,482
Attorney for Appellants

Pratt & Whitney
Patent Department, M/S 132-13
400 Main Street
East Hartford, CT 06108
Voice: 860.557.1089